

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
PLASMART, INC.

Plaintiff,

v.

JOHN F. SAUERLAND, D/B/A VERTEX
EDUCATIONAL TOYS AND IQ KIDS,

Defendant.
----- X

Case No. 07 CIV. 8191
Judge Crotty

**MOTION TO
ADMIT JANET L. CULLUM
PRO HAC VICE**

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, the undersigned, William O'Brien, a member in good standing of the bar of the Court, hereby move for an Order admitting

Janet L. Cullum
COOLEY GODWARD KRONISH LLP
1114 Avenue of the Americas
New York, New York 10036-7798
Phone: (212) 479-6000
Fax: (212) 479-6275

FILED
U.S. DISTRICT COURT
2007 NOV -9 PM 3:25
S.D. OF N.Y.

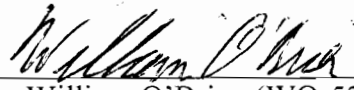
as attorney *pro hac vice* to argue or try this case in whole or in part as counsel to Defendant John F. Sauerland, in this case. Ms. Cullum is a partner in the firm of Cooley Godward Kronish LLP and a member in good standing of the Bar of the State of California. There are no pending disciplinary proceedings against Ms. Cullum in any state or federal court. I am informed that the plaintiff's counsel has been conferred with, and that plaintiff's counsel has no objection to the relief requested in this motion.

11-9-07
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4532349

Dated: New York, New York
November 9, 2007

Respectfully submitted,

COOLEY GODWARD KRONISH LLP

By: 
William O'Brien (WO-5271)

Counsel for Defendant, John F. Sauerland
1114 Avenue of the Americas
New York, NY 10036-7798
Phone: (212) 479-6000
Fax: (212) 479-6275

TO: Jeffrey Sonnabend
SonnabendLaw
600 Prospect Avenue
Brooklyn, New York 11215-6012
JSonnabend @Sonnabendlaw.com

Counsel for Plaintiff
Plasmart, Inc.

1379349 v1/NY
11/09/07 10:24 AM

UNITED STATES DISTRICT COURT
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**AFFIDAVIT OF WILLIAM
O'BRIEN IN SUPPORT OF
MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

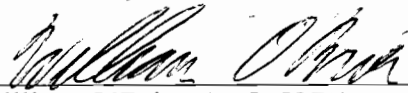
STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

William O'Brien, being duly sworn, hereby deposes and says as follows:

1. I am a partner of Cooley Godward Kronish LLP, counsel for Defendant, John F. Sauerland, in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Janet L. Cullum as counsel pro hac vice to represent Defendant, John F. Sauerland, in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1978. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Janet L. Cullum since January 2007.
4. Ms. Cullum is a partner of Cooley Godward Kronish, in New York, New York.
5. I have found Ms. Cullum to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Janet L. Cullum, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Janet L. Cullum, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Janet L. Cullum, pro hac vice, to represent Defendant, John F. Sauerland, in the above captioned matter, be granted.

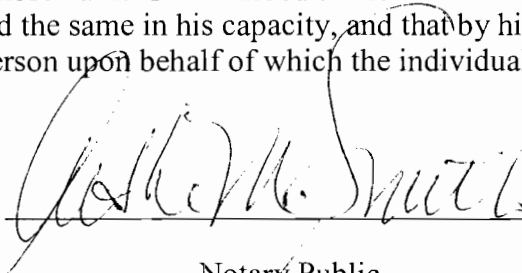
Respectfully submitted,



William O'Brien (WO-5271)

STATE OF NEW YORK)
) ss:
COUNTY OF Kings)

On the 9 day of Nov, 2007, before me, the undersigned, a Notary Public in and for said State, personally appeared William O'Brien, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.



Notary Public

AISHA M. SMITH
Notary Public, State of New York
No. 01SM6141227
Qualified in New York County
Commission Expires Feb. 21, 2010

1379365 v1/NY
11/09/07 11:43 AM



THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

November 5, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JANET LESLIE CULLUM, #104336 was admitted to the practice of law in this state by the Supreme Court of California on December 3, 1982; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Custodian of Membership Records

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Defendant.
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Case No. 07 CIV. 8191
Judge Crotty

**AFFIRMATION OF JANET L.
CULLUM IN SUPPORT OF
MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

JANET L. CULLUM, pursuant to Title 28, United State Code, Section 1746, hereby
affirms under penalty of perjury:

1. I am an partner in the law firm of Cooley Godward Kronish LLP, 1114
Avenue of the Americas, New York, NY, 10036.
2. I submit this affirmation in support of my motion for admission to practice
pro hac vice in the above-captioned case.
3. As shown in the Certificate of Good Standing annexed hereto, I am a
member in good standing of the Bar of the State of California.
4. There are no pending disciplinary proceedings against me in any state or
federal court.
5. Wherefore, I respectfully request that I be permitted to appear as counsel
for defendant John F. Sauerland in this case.

Dated: November 9, 2007



Janet L. Cullum

1380367 v1/NY
11/09/07 10:26 AM

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Plaintiff,

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EDUCATIONAL TOYS AND IQ KIDS,

Defendant.
----- X

Case No. 07 CIV. 8191
Judge Crotty

**ORDER FOR ADMISSION TO
PRACTICE
PRO HAC VICE**

The motion for admission to practice *pro hac vice* in the above captioned matter is granted. The admitted attorney, Janet L. Cullum, is permitted to argue or try this particular case in whole or in part as counsel or advocate on behalf of Defendant John F. Sauerland.

An attorney admitted to practice *pro hac vice* is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's office. When paying by mail, return a copy of this Order to the Clerk's office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission *pro hac vice* for the above listed case will be made on the roll of attorneys.

The attorney admitted *pro hac vice* must serve a copy of this Order on all counsel in this case.

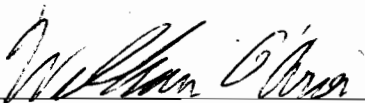
Dated: _____

United States District Judge

CERTIFICATE OF SERVICE

I, William O'Brien, hereby certify that I caused a true and correct copy of the foregoing Motion to Admit Janet L. Cullum *Pro Hac Vice*, the Affidavit of William O'Brien In Support of Motion to Admit Counsel *Pro Hac Vice* and the proposed Order for Admission to Practice *Pro Hac Vice* to be served by regular mail this 9th day of November, 2007 upon:

Jeffrey Sonnabend
SonnabendLaw
600 Prospect Avenue
Brooklyn, New York 11215-6012
JSonnabend @Sonnabendlaw.com


William O'Brien (WO-5271)